

TO : Ryan Benefield, Chief, HWD

THROUGH : Tammie Hynum, Technical Branch Manager, HWD
Jim Rigg, Geol. Supervisor, Technical Branch, HWD

FROM : Cindy Greenway, Geologist, Technical Branch, HWD

DATE : January 2, 2008

SUBJECT : Sampling and Analysis Plan Summary (SAPS)
Cedar Chemical Corporation Facility, Helena-West Helena, AR.,
December 2007

I have reviewed the referenced document and have the following comments:

- I suggest that Dick Cassat review sections Eight and Nine.
- On page four of the SAPS under Section 3.2 it states "If the agriculture wells are configured with turbine pumps and electricity, they will be developed by allowing the turbine pump at each well to operate at approximately five to ten minutes." The ADEQ disagrees that allowing the wells to be developed for five to ten minutes may not be adequate, due to the fact that a representative groundwater sample may not be obtained. Three well volumes are required for sampling per EPA protocol.